



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 22, 2019

BY ECF

The Honorable Gabriel W. Gorenstein
Chief United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Therese Okoumou, 18 Cr. 469 (GWG)

Dear Judge Gorenstein:

The Government submits this letter in response to the Court's Order of February 20, 2019 directing the Government to investigate the possibility for the Court to conduct a site visit to better appreciate the risks or hazards created by the defendant's conduct on July 4, 2018.

Having conferred with the United States Park Police ("USPP") and defense counsel regarding availability and the necessary logistics, the Government recommends the following:

The best dates for the Court to conduct the site visit would be either [REDACTED] or [REDACTED], although [REDACTED] can also be accommodated if that is better for the Court. In addition, the USPP recommends conducting the visit outside of normal visiting hours, which will allow the Court greater freedom of movement without impeding visitor access.

Logistically, all participants may convene at [REDACTED]
[REDACTED] and then the USPP can escort the Court and other participants to the observation deck at Level 6P of the Statue.¹

The USPP has discussed internally, including with the SWAT Unit, the feasibility of providing the Court with a ladder to climb from the observation deck to see the area where the defendant was situated. For reasons that the USPP can explain in further detail if the Court wishes, the USPP has determined that it is not possible to set up a ladder in such a way as to ensure the Court's safety.

¹ [REDACTED]

The Government is ready to look into any additional questions the Court may have, or investigate the availability of specific alternative dates to accommodate the Court's schedule.

Respectfully submitted,

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cc: All Counsel of Record (via ECF and email)